

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>Jeffrey Marc Siskind 3465 Santa Barbara Drive Wellington, FL 33414</p> <p><input checked="" type="checkbox"/> Attorney for:</p>	<p>FOR COURT USE ONLY</p>
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re: Jeffrey Marc Siskind,</p> <p>Debtor(s).</p>	<p>CASE NO.: 23-11720-VZ CHAPTER: 13</p> <p><b>NOTICE OF OBJECTION TO CLAIM</b></p> <p>DATE: 09/18/2023 TIME: 11:30 am COURTROOM: 1368 PLACE: 255 E Temple Street Los Angeles, CA 90012</p>

1. TO (specify claimant and claimant's counsel, if any): U.S. Bank, NA; JaVonne M. Phillips, Esquire
2. NOTICE IS HEREBY GIVEN that the undersigned has filed an objection to your Proof of Claim (Claim #1) filed in the above referenced case. The Objection to Claim seeks to alter your rights by disallowing, reducing or modifying the claim based upon the grounds set forth in the objection, a copy of which is attached hereto and served herewith.
3. **Deadline for Opposition Papers:** You must file and serve a response to the Objection to Claim not later than 14 days prior to the hearing date set forth above.

**IF YOU FAIL TO TIMELY RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

Date: 08/07/2023

Jeffrey M. Siskind, Pro Se  
Printed name of law firm

Signature

Date Notice Mailed: 08/07/2023

Printed name of attorney for objector

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION

IN RE:  
JEFFREY MARC SISKIND,  
Debtor.

CASE NO. 2:23-BK-11720-VZ  
CHAPTER 13

**OBJECTION TO PROOF OF CLAIM NO. 1**

COMES NOW the Debtor, Jeffrey Marc Siskind, Pro Se, and files this Objection to Proof of Claim No. 1, and states:

1. Debtor filed its Chapter 13 petition on March 23, 2023.
2. Prior to the deadline for filing non-governmental Proofs of Claim which was June 1, 2023, Creditor U.S. Bank, N.A. ("Claimant") filed a Proof of Claim ("POC") which stated that the Debtor is liable to Claimant for the full balance on a mortgage on real property that is not owned by Debtor.
3. The original mortgage was modified since the original promissory note, mortgage and riders were executed and Claimant and/or its predecessor-in-interest permitted the property to be transferred to a trust. See attached "Exhibit A."
4. Contrary to the allegations contained within the POC and the attachments thereto, Debtor is only liable for any deficiency after Claimant has exercised its rights pursuant to the note and mortgage, as modified.
4. The real property that secures Claimant interest therein is worth almost \$1 million more than the current amount stated as owed in the POC.
5. Any deficiency is therefore contingent, disputed and unliquidated.

6. Debtor objects to the POC except to the extent that it seeks to recover a contingent, disputed and unliquidated deficiency.

WHEREFORE, Debtor objects to POC No. 1 filed by U.S. Bank, N.A. as stated herein.

/s/ Jeffrey M. Siskind  
Jeffrey M. Siskind, Pro Se  
3465 Santa Barbara Drive  
Wellington, FL 33414

TELEPHONE (561) 791-9565 FACSIMILE (561) 791-9581  
Emails: jeffsiskind@msn.com & jeffsiskind@gmail.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the above Objection to Proof of Claim No. 1 was served upon Claimant and appropriate creditors as evidenced on the attached Proof of Service of Document.

/s/ Jeffrey M. Siskind  
Jeffrey M. Siskind, Pro Se

# EXHIBIT A



Prepared by and Return To:  
Jeffrey M. Siskind, Esquire  
525 S. Flagler Drive, Suite 500  
West Palm Beach, FL 33401

PCN 73-41-44-21-03-000-0010

CFN 20120147680  
OR BK 25138 PG 1202  
RECORDED 04/16/2012 09:18:04  
Palm Beach County, Florida  
AMT 10.00  
Doc Stamp 0.70  
Sharon R. Bock, CLERK & COMPTROLLER  
Pg 1202; (1pg)

### Warranty Deed

This Warranty Deed made this 12<sup>th</sup> day of April, 2012 between Jeffrey M. Siskind and Second Siskind Family Trust, whose address is c/o Jeffrey M. Siskind, 525 South Flagler Drive, Suite 500, West Palm Beach, FL 33401 "Grantee."

(Whenever used herein the terms "Grantor" and "Grantee" include all the parties to this instrument and the heirs, legal representatives, and assigns of individuals, and the successors and assigns of corporations, trusts and trustees.)

Witnesseth, that said Grantor, for and in consideration of the sum TEN AND NO/100 DOLLARS (\$10.00) and other good valuable consideration to said Grantor in hand paid by said Grantee, the receipt whereof is hereby acknowledged, does hereby grant, bargain, sell, alienate, remise, release, convey and confirm unto the said Grantee, and Grantee's heirs and assigns forever, all the right, title, interest, claim and demand which Grantor has in and to the following described land, situate, lying and being in Palm Beach County, Florida to-wit:

Lot 1, Phase I of SOUTFIELDS OF PALM BEACH ROLO AND COUNTRY CLUB - WELLINGTON COUNTRYPLACE - P.U.D., according to Plat thereof as recorded in Plat Book 39, Page 19, Public Records of Palm Beach County, Florida.

To Have and to Hold, the same together with all and singular the appurtenances thereto belonging or in anywise appertaining, and all the estate, right, title, interest, lien, equity and claim whatsoever of Grantor, either in law or equity, for the use, benefit and profit of the said Grantee forever.

Subject to zoning, restrictions, prohibitions and other requirements imposed by governmental authority, restrictions and matters appearing on the Plat or otherwise common to the subdivision, easements of record, taxes for the current year and all subsequent years, and all items of record, which are not intended to be re-imposed hereby.

In Witness Whereof, Grantor has signed and granted these presents the day and year first above written.

Witness as to both signors

Print: Martin D Geos

Witness as to both signors

Print: Liliana Cruz

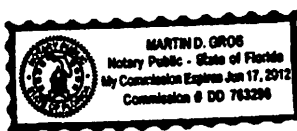
Jeffrey M. Siskind

State of Florida

County of Palm Beach

Before me this 12 day of April, 2012, appeared Jeffrey M. Siskind, who produced \_\_\_\_\_ as identification, or who is personally known to me and who voluntarily affixed their signatures hereto in my presence, and did/did not take an oath.

(SEAL)



NOTARY PUBLIC

Print Name: Martin D Geos

Comm. Exp. 6-17-2012

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
17927 77th Lane, Loxahatchee, FL 33470

A true and correct copy of the foregoing document entitled: **NOTICE OF OBJECTION TO CLAIM** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 08/07/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:  
United States Trustee (LA); ustpreion16.la.ecf@usdoj.gov  
JaVonne M Phillips, McCarthy & Holthus, LLP; bknotice@mccarthyholthus.com  
Arvind Nath Rawal; arawal@aisinfo.com  
Nancy K Curry (TR); trustee13la@aol.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 08/07/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Vincent P. Zurzolo  
United States Bankruptcy Court  
Central District of California  
255 East Temple Street, Suite 1360  
Los Angeles, CA 90012

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

08/07/2023      Josef Schneider  
Date                      Printed Name

  
Signature